

APPENDIX A

SUMMARY OF PLAINTIFFS' DEFICIENT INTERROGATORY RESPONSES

| No. | Interrogatory ¹ | Response ² |
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| 1 | "Identify each and every one of Your state's agencies, entities, divisions, or departments that has used Display Advertising or Ad Tech Products during the Relevant Period." | All Plaintiffs except Nevada object to "this interrogatory to the extent it seeks information that is not within their possession, custody, or control" and relied on their objection to Google's definition of the term "You" or "Your" by construing the "term to refer to the units, departments, or subdivisions within the Offices of the Attorney General of each respective Plaintiff State." |
| 2 | "Identify all remedies You seek in this Action, in what capacity (such as <i>parens patriae</i> or sovereign capacity) You seek each remedy, and the statutory or other legal basis for each such remedy." | Plaintiffs provided a revised response to this Interrogatory on December 6, 2023 which Google is reviewing. |
| 4 | "Identify all injured persons or categories of persons on whose behalf You as <i>parens patriae</i> seek monetary relief (including, where applicable, restitution, disgorgement, civil penalties, civil fines, or damages) in this Action . . ." | Plaintiffs have provided conflicting responses. Plaintiffs' revised responses dated December 6, 2023 identified four Plaintiffs (Arkansas, Kentucky, Missouri, and North Dakota) that are seeking <i>parens patriae</i> relief. But Plaintiffs also provided a separate Appendix B to their revised responses which identifies a different set of six Plaintiffs (Arkansas, Louisiana, Nevada, North Dakota, Puerto Rico, and South Dakota) that are seeking <i>parens patriae</i> relief. And none of these |

¹ We summarize here only the principal interrogatories where Google contends Plaintiffs' responses have been manifestly inadequate. The fact that we have omitted some Interrogatories is not an admission these Interrogatories were sufficiently responded to nor does it relieve Plaintiffs of their obligations to continue to update their responses to these Interrogatories.

² Pl. States' Third Am. Resps. & Objs. to Google's First Set of Interrogs. (Dec. 6, 2023). The State of Alaska initially served separate responses to Google's interrogatories, on March 13, 2023. Alaska's Resps. & Objs. to Google's First Set of Interrogs. (Mar. 13, 2023). It is not clear whether the Third Amended Responses & Objections served on December 6 were on behalf of Alaska as well. While Alaska is not included in the definition of Plaintiff States in the revised responses, and no signature page for Alaska is included, certain revised Interrogatory responses include substantive responses that appear to be on behalf of Alaska. As a result, this Appendix A treats Plaintiffs' Third Amended Responses & Objections as being on behalf of all Plaintiffs.

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| | | Plaintiffs have identified persons or categories of persons on whose behalf each State seeks monetary relief and the specific monetary remedies each State is seeking for <i>each category</i> . |
| 5 | “Identify and quantify all harm to the general welfare and the economy of Your state for which You seek monetary relief (including, where applicable, restitution, disgorgement, civil penalties, civil fines, or damages) in this Action, and specify the particular relief You seek for each such harm.” | All Plaintiffs “object to this interrogatory as premature given the status of the case and the fact that discovery is ongoing . . . [and] on the basis that this request calls for the premature disclosure of expert opinions.” Plaintiffs “will supplement their responses . . . at a later date once they have designated experts and obtained sufficient discovery to make a complete response.” |
| 6 | “Identify all injunctive or structural relief You seek in this Action . . . ” | All Plaintiffs “object to this interrogatory as premature given the status of the case and the fact that discovery is ongoing . . . [and] on the basis that this request calls for the premature disclosure of expert opinions.” Plaintiffs “will supplement their responses . . . at a later date once they have designated experts and obtained sufficient discovery to make a complete response.” |
| 7 | “Identify the ‘data and information unlawfully taken from consumers by means of deceptive trade practices’ for which You seek disgorgement in Paragraph 683(g) of the Third Amended Complaint, and describe how such disgorgement is to be effected and implemented.” | All Plaintiffs “object on the basis that this request calls for the premature disclosure of expert opinions” and “incorporate by reference paragraphs 572-583 of the Fourth Amended Complaint.” |
| 8 | “Identify with particularity each and every act, practice, or statement by Google that You allege to have been unfair or deceptive . . . ” | Plaintiffs provided a revised response to this Interrogatory on December 6, 2023 which Google is reviewing. |
| 11 | “Identify any communications with or from Google upon which You rely for any of Your claims . . . ” | All Plaintiffs “object to this interrogatory as premature given the status of the case and the fact that discovery is ongoing . . . [and] on the basis that this is a contention interrogatory that need not be answered until the conclusion of fact discovery.” |

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| 12 | “Identify all contracts that You allege coerced customers into using DFP with AdX, as set forth in Paragraphs 245-252 of the Third Amended Complaint . . . “ | All Plaintiffs “object to this interrogatory as misstating their claims, which allege . . . that Google’s decision to no longer offer AdX-only contracts was coercive.” Plaintiffs also “object to this interrogatory as premature given the status of the case and the fact that discovery is ongoing . . . [and] will supplement its response . . . at a later date once they have designated experts and obtained sufficient discovery to make a complete response” |
| 14 | “Identify the earliest date on which You believe Google possessed monopoly power in each of the markets that You allege to be relevant to Your claims, and describe how You believe Google obtained monopoly power in each of those markets.” | All Plaintiffs “object to this interrogatory as premature given the status of the case and the fact that discovery is ongoing . . . [and] on the basis that this request calls for the premature disclosure of expert opinions.” Plaintiffs “will supplement its response . . . at a later date once they have designated experts and obtained sufficient discovery to make a complete response.” |
| 15 - 21 | Interrogatories seeking information about “each agency, department, entity, or division of Your state (including the office of the Attorney General) that has used Ad Tech Products or Display Advertising” related to their use of Ad Tech Products or Display Advertising. | All Plaintiffs except Nevada declined to provide information for any agency, department, entity, or division of the state other than the office of the Attorney General and its divisions. |
| 22 | “Identify all facts and documents supporting Your allegations concerning the alleged 2020 Facebook boycott described in Paragraph 175 of the Third Amended Complaint.” | All Plaintiffs “object to this interrogatory as premature given the status of the case and the fact that discovery is ongoing . . . [and] on the basis that this request calls for the premature disclosure of expert opinions.” Plaintiffs state that the “allegations were based on publicly available information . . . [and] will supplement their response to this interrogatory at a later point if they obtain additional information that is not readily |

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| | | available in the public domain.” |
| 26 | “For each category of monetary relief (including where applicable restitution, disgorgement, civil penalties, civil fines, or damages) that You seek in this Action, provide a computation of the amount of each category of monetary relief sought for each count.” | All Plaintiffs “object to this interrogatory as premature given the status of the case and the fact that discovery is ongoing . . . [and] on the basis that this request calls for the premature disclosure of expert opinions.” |
| 29 | “With respect to each harm or injury for which You seek relief in this Action in Your sovereign capacity, identify each person with knowledge of that harm or injury.” | All Plaintiffs “object to this interrogatory as premature given the status of the case and the fact that discovery is ongoing . . . [and] on the basis that this request calls for the premature disclosure of expert opinions.” |
| 30 | “With respect to each harm or injury for which You seek relief in this Action as parens patriae, identify each person with knowledge of that harm or injury.” | All Plaintiffs “object to this interrogatory as premature given the status of the case and the fact that discovery is ongoing . . . [and] on the basis that this request calls for the premature disclosure of expert opinions.” |
| 31 | “With respect to each harm or injury to the general welfare and the economy of Your state for which You seek relief in this Action, identify each person with knowledge of that harm or injury.” | All Plaintiffs “object to this interrogatory as premature given the status of the case and the fact that discovery is ongoing . . . [and] on the basis that this request calls for the premature disclosure of expert opinions.” |